

# Fibre Packaging Europe

European coalition for renewable, circular and sustainable paper and board packaging.



1500 companies



2200 manufacturing plants



365.000 people across Europe



EUR 120 billion annual turnover

## Fibre Packaging Europe's recommendations for the trilogue negotiations on Packaging Packaging Waste Regulation

[Fibre Packaging Europe](#) (FPE) is an informal coalition of seven trade associations along the **fibre packaging value chain in Europe**. Coming together to speak with one voice on the policy issues central to our ecosystem, collectively, FPE members represent **1500 companies** employing **365,000 people** across **2,200 facilities in Europe**, generating around **€120 billion in annual turnover**.

In the context of the interinstitutional negotiations on the Packaging and Packaging Waste Regulation (PPWR), the fibre packaging value chain would like to draw your attention to several important issues:

### Article 3 - Definitions

#### ❖ Ensure legal clarity on the “composite” packaging definition (paragraph 19)

FPE strongly supports the **European Parliament's proposal on Article 3, point 19 (row 188 of the four-column document)**, setting a 10% threshold for the weight of the main packaging material to classify the whole packaging as composite. Indeed, a 10% threshold would provide clarity for packaging categorisation in the PPWR, which is important for selecting the right recyclability assessment criteria. The threshold is also an ambitious compromise to those already adopted in the Member States for the purpose of EPR fee eco-modulation. Additionally, this threshold would ensure a level playing field for recyclable packaging sourced from renewable materials with functional barriers that do not preclude recyclability. The harmonisation would also play a key role in labelling, as businesses could refer to clear EU-wide provisions, ultimately benefiting consumer transparency.

#### ❖ Define “High-Quality Recycling” in a clear and material-neutral way (paragraph 32b)

FPE advocates evaluating packaging recyclability based on defined criteria outlined in Article 6(2) of the proposal. We emphasise assessing recyclability by the quality of recycled materials and their ability to replace primary raw materials. While closed-loop recycling is valuable for some packaging, it is often impractical due to technical and legal constraints, potentially disadvantaging most packaging formats. FPE opposes mandated closed-loop requirements for paper recycling, fearing increased packaging transportation. Instead, FPE highlights the high-quality recycling of paper and board fibres within the paper loop and supports the **Parliament's approach to Article 3, paragraph 32b (row 201b of the four-column document)**, as it would ensure more clarity for businesses.

### Article 21 - Empty space ratio for grouped transport and e-commerce packaging (paragraph 1)

Void space limits should be realistic, especially considering the logistics of transporting fragile goods. FPE supports the **Parliament's position in paragraph 1 (row 421 of the four-column document)**, calling for the minimisation of the empty space ratio applied to all packaging. However, in order to ensure a level playing field across all packaging sectors, FPE encourages legislators to delete empty space ratio exemptions for reusable packaging (**row 426 of the four-column document**). Exempting reusable packaging from this requirement will increase plastic packaging, transport and emissions.

### Article 22 – Restrictions on the use of certain packaging formats

**Packaging is crucial for preserving goods, extending shelf life, and reducing food waste.** Single-use paper products help maintain product freshness, while fibre-based materials ensure food safety. Reusable packaging systems may increase cross-contamination risks due to cleaning, storage, and transportation challenges.

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- ❖ **Retain exemption from bans based on a high collection for recycling rate (Art. 22, paragraph 1; Annex V, rows 2, 3, 4)**

Article 22 and Annex V introduce bans on single-use packaging. The fibre packaging industry opposes these bans due to concerns on their potential negative impact and contradiction with the Waste Framework Directive's goals, which are to follow the waste hierarchy but also to be able to divert from it when it makes sense from an environmental point of view. Banning certain recyclable packaging risks increased contamination and environmental harm. For this reason, the fibre packaging value chain supports the **Parliament's position on Article 22, paragraph 4** to review Annex V provisions restricting the use of specific packaging. **In line with the Parliament's approach**, the industry urges removing the ban on single-use fibre packaging for fruit, vegetables, and HORECA, **covered by Article 22 and Annex V points 2, 3 and 4**. Moreover, **FPE welcomes the Parliament's derogation clause in Article 22, paragraph 1 for single-use packaging that achieves effective separate collection for recycling of at least 85% by weight of the packaging they place on the market (row 428 of the four-column document)**.

- ❖ **Address waste and counterfeiting by removing bans on healthcare and cosmetics packaging (Annex V, row 5b)**

While supporting packaging minimisation, **FPE argues that all packaging must be 'fit for purpose' and, therefore, warns against the inclusion of Annex V, row 5b of the Parliament's approach in the final text**. Fibre packaging for healthcare and cosmetics, including medical creams, protects fragile primary packaging and addresses counterfeiting with features like QR codes and UV-visible inks. Counterfeiting in the cosmetics industry results in an estimated EUR 7 billion annual loss in the EU. Fibre packaging also enhances consumer safety with tamper-evident features and health information. Its recyclability and space-saving benefits in transport further underscore its value. Considering these functions, the unintended consequences of banning such packaging should be fully acknowledged.

## **Article 26 - Reuse targets:**

Reuse and recycling are complementary solutions in achieving a circular economy and it is crucial that the legislation recognises 1) the benefits of packaging made from renewable materials and 2) well-functioning, highly circular systems. FPE is advocating to:

- ❖ **Keep exemptions for cardboard in the final text (paragraphs 10, 12, 13)**

FPE welcomes the three institutions' recognition in their respective approaches that it is essential to **retain the exemptions for cardboard from reuse targets for grouped and transport packaging** (Article 26 paragraphs 10, 12, 13 to be found in rows 473, 480, 482 of the four-column document). This is crucial not only for the cardboard industry but also for the operators who rely on various packaging formats to optimise operations environmentally and economically. A move toward reusable packaging could lead to higher emissions and logistic costs. Additionally, **cardboard is sustainable and a circularity enabler**. It is sourced from renewable materials and is collected and recycled at a very high rate, with corrugated cardboard being the most recycled packaging (89-90%). The only alternative would be the production of billions of plastic packaging items, increasing the environmental impact of packaging.

- ❖ **Recognise the risk of reuse for perishable products by removing targets for perishable beverages (paragraphs 4 and 13b)**



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Reusable packaging for perishable products poses health, safety, and hygiene risks. **FPE supports the exemptions provided for such items from reuse targets in the positions of the Council** (Article 26, paragraph 4 to be found in row 457a of the four-column document) **and the Parliament** (Article 26, paragraph 13b to be found in row 482a of the four-column document). Legal constraints and limitations on preservatives for fruit juices and nectars necessitate specific packaging conditions for safety and human health protection (e.g., pasteurisation, aseptic filling). To ensure legal clarity and minimise risks, the industry recommends **defining perishable beverages in line with recital 68 of the Council's General Approach** as *"beverages which due to their raw ingredients of agricultural origin are sensitive to microbiological spoilage and, in order to prevent a danger to human health and ensure their microbiological stability during storage at ambient temperature, require both the use of specific preservation processes and aseptic filling conditions. If not, these products must be stored chilled in order to ensure their microbiological stability."*

- ❖ **Allow paper-based packaging solutions for HORECA take-out and home delivery (paragraphs 2 and 3)**

The fibre packaging value chain advocates for **the deletion of paragraph 2 and 3, as proposed by the Parliament (rows 449-454 of the four-column document)**. As stated by the Rapporteur, the environmental benefits of mandatory reuse targets for food and drink takeaway packaging are not proven nor properly addressed in the Commission's impact assessment. Additionally, taking into consideration the lack of large-scale systems within the Member States, specific targets for reuse in these sectors cannot be set without prior analysis.

- ❖ **Ensure a harmonised approach to prevent internal market fragmentation (paragraphs 7, 8, 9, 10, 12, 13, 15a and 15aa)**

**A harmonised approach to reuse targets across EU Member States is imperative to maintaining a functional internal market.** Consequently, enabling divergent reuse targets across Member States proposed in the Council's approach should be avoided in paragraphs 7, 8, 9, 10, 12, 13, 15a and 15aa. (rows 465, 466, 468, 469, 671,672,674,675, 486b, 486c of the four-column document)

- ❖ **Evidence-based policy decisions when introducing new targets (paragraph 16)**

**Evidence-based policy decisions are crucial to determine the need for potential bans and reuse targets and to avoid negative impacts on the agri-food chain, water and food security, consumers, and the environment.** Consequently, in paragraph 16, FPE advocates against empowering the European Commission to introduce new targets as these should be set only via ordinary legislative procedure, and subject to proper scrutiny by co-legislators. However, the fibre packaging value chain supports the possibility of exemptions for sectors facing economic constraints related to compliance with the targets. FPE also welcomes Parliament's removal of 2040 reuse targets on specific types of packaging to fully evaluate the impact of the initial 2030 targets before implementing new measures.

## **Article 29 - Plastic and paper carrier bags**

FPE opposes a comparable treatment for plastic and paper carrier bags and advises **against including paragraph 4a of the Parliament's position** (row 518a of the four-column document). Plastic bags contribute to unsustainable consumption and waste, while paper bags are renewable and biodegradable. There is a need for sustainable alternatives at checkout counters. Limiting paper bag

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availability may increase the use of lightweight plastic or reusable bags, contrary to sustainable development goals. **FPE recommends keeping the reporting in Article 50, paragraph 1, of other material carrier bags as voluntary, as suggested in the Council's approach** (row 721 of the four-column document).

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## About Fibre Packaging Europe

Fibre Packaging Europe is an informal coalition of seven trade associations representing industries involved in forestry, pulp, paper, board and carton production and recycling from across Europe. Our joint mission is to provide renewable, circular and sustainable fibre-based packaging solutions to European citizens to achieve the European Green Deal objectives.

For more information, please contact [info.fpe@logos-pa.com](mailto:info.fpe@logos-pa.com)



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